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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,)	CR 15-319 RS
13)	
14 Plaintiff,)	STIPULATION TO TRANSFER FIREARMS TO
15 v.)	FEDERAL FIREARMS LICENSEE; PROPOSED
16)	ORDER
17 SHAUN W. BRIDGES,)	
18)	
19 Defendant.)	

20 IT IS HEREBY STIPULATED by and petitioner Deborah Pease-Martinez, both individually and
21 in her capacity as the Settlor and Trustee of the NFA Family Trust (the "Petitioner") and the United
22 States of America (collectively the "parties") to transfer the property described below (the "subject
23 firearms") to a federally licensed firearms dealer:

- 24 a. FNH Scar 17 Rifle (SN# HC24801)
- 25 b. FNH Scar 16 Rifle (SN# LC26320)
- 26 c. Christensen Arms Rifle (SN# CA02181)
- 27 d. Mossberg Shotgun 12GA (SN# AF120609)

28 1. On or about March 29, 2015, defendant Shaun Bridges sold the subject firearms to Ariana
Esposito. See Docket No. 158, Exhibit 2.

STIPULATION TO TRANSFER FIREARMS AND DISMISS
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1 2. On or about March 29, 2015, Ms. Esposito and Deborah Pease-Martinez created a trust in
2 the state of Maryland known as the NFA Family Trust. See Docket No. 158, Exhibit 1.

3 3. On or about April 1, 2015, defendant Shaun Bridges surrendered physical custody of the
4 subject firearms to the United States. See Docket No. 158 p.2 ¶ 3.

5 4. Petitioner states and agrees that Deborah Pease-Martinez, as Settlor and Trustee of the
6 NFA Family Trust, is authorized to enter into this Settlement Agreement on behalf of the NFA Family
7 Trust. Petitioner further asserts that the NFA Family Trust is the sole owner of the subject firearms.

8 5. Petitioner agrees that the FFL or United States may remove the barrel of the Christensen
9 Arms Rifle (SN# CA02181). Petitioner further agrees that the barrel of the Christensen Arms Rifle will
10 be sent to a third-party agreed-upon by the parties.

11 6. The parties agree that the subject firearms shall be transferred to the following Federal
12 Firearms Licensee (the "FFL"):

13 2 A Sales & Supplies
14 8610 Washington Blvd, Suite 209
15 Jessup, MD 20794

16 7. Petitioner understands and agrees to keep the subject firearms out of the custody or
17 control of any person prohibited from possessing firearms by 18 U.S.C. § 922(g), including but not
18 limited to Shaun Bridges. Petitioner acknowledges that allowing a prohibited person to use, possess, or
19 control the subject firearms would aid and abet a violation of 18 U.S.C. § 922(g), a felony.

20 IT IS SO STIPULATED:

21 Dated: 1/10/2018


DEBORAH PEASE-MARTINEZ
Petitioner.

23 Dated: 1/16/18


DAVID B. COUNTRYMAN
Assistant United States Attorney

28 STIPULATION TO TRANSFER FIREARMS AND DISMISS
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1 ~~PROPOSED~~ ORDER

2 UPON CONSIDERATION of the STIPULATION TO TRANSFER FIREARMS TO FEDERAL
3 FIREARMS LICENSEE, the entire record, and for good cause shown, it is by the Court on this 17th
4 day of January, 2018, hereby

5 ORDERED that the United States may remove the barrel of the Christensen Arms Rifle (SN#
6 CA02181) and transfer the barrel to a third-party agreed-upon by the parties.

7 ORDERED that the (1) FNH Scar 17 Rifle (SN# HC24801); (2) FNH Scar 16 Rifle (SN#
8 LC26320; (3) Christensen Arms Rifle (SN# CA02181) with the barrel removed; and (3) Mossberg
9 Shotgun 12GA (SN# AF120609) may be transferred to the following federal firearms licensee:

10 2 A Sales & Supplies
11 8610 Washington Blvd, Suite 209
12 Jessup, MD 20794

13 Petitioner is further ORDERED to keep the any of the firearms listed above out of the custody or
14 control of any person prohibited from possessing firearms by 18 U.S.C. § 922(g), including but not
15 limited to Shaun Bridges.

16 It is further ORDERED that the instant complaint be dismissed.

17
18 IT IS SO ORDERED.

19 Dated: 1/17/18

20 
21 HONORABLE RICHARD SEEBORG
22 United States District Judge
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